

EXHIBIT A

From: [Papenhausen, Lauren](#)
To: [CS Flashner](#); [Frank, Stephen \(USAMA\) 1](#)
Cc: [Reitmeier, Emily A](#); [B Kelly](#); [McGee-Tubb, Mathilda](#); [Kendall, Michael](#); [J Sharp](#); [Chu, Yanbing](#); [Mulcahy, Peter](#); [EP Beirne](#); [Michael Loucks](#); [Jack Dicanio](#); [Andrew Tomback](#)
Subject: RE: Excluding the Names of the Defendant's Children from the Government's Witness List
Date: Friday, July 30, 2021 4:57:30 PM

Steve:

We want to provide notice that John Wilson may call as witnesses: Leslie Wilson; John Wilson, Jr.; Courtney Wilson; and Mary Wilson. Along the same lines (and for the same reasons) as the parties' agreement (below) regarding exclusion of the defendants' children from the government's witness list, we did not want to include Mr. Wilson's family members on any publicly filed witness list, but we did want to provide notice of the possibility that we may call one or more of them as witnesses. Please direct any communications with any of these potential witnesses through Mike Kendall or me.

Thanks,
Lauren

Lauren M. Papenhausen | Partner
T +1 617 979 9312 M +1 617 861 7629 E lauren.papenhausen@whitecase.com
White & Case LLP | 75 State Street | Boston, MA 02109-1814

From: CS Flashner <csflashner@mintz.com>
Sent: Thursday, June 24, 2021 4:50 PM
To: Frank, Stephen (USAMA) 1 <Stephen.Frank@usdoj.gov>
Cc: Reitmeier, Emily A <Emily.Reitmeier@skadden.com>; B Kelly <bkelly@nixonpeabody.com>; McGee-Tubb, Mathilda <MSMcGee-Tubb@mintz.com>; Kendall, Michael <michael.kendall@whitecase.com>; Tracy Miner <tminer@msdefenders.com>; J Sharp <jsharp@nixonpeabody.com>; Megan Siddall <msiddall@msdefenders.com>; Papenhausen, Lauren <lauren.papenhausen@whitecase.com>; Chu, Yanbing <y.chu@whitecase.com>; Mulcahy, Peter <PCMulcahy@mintz.com>; EP Beirne <epbeirne@mintz.com>; Michael Loucks <michael.loucks@skadden.com>; Jack Dicanio <jack.dicanio@skadden.com>
Subject: Excluding the Names of the Defendant's Children from the Government's Witness List

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Cory Flashner
Member

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
One Financial Center, Boston, MA 02111
(O) +1.617.348.1605 (M) +1.617.939.4870
CSFlashner@mintz.com | Mintz.com



STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the email to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify the Mintz, Levin, Cohn, Ferris, Glovsky and Popeo sender immediately, and destroy all copies of this message and any attachments.

This email communication is confidential and is intended only for the individual(s) or entity named above and others who have been specifically authorized to receive it. If you are not the intended recipient, please do not read, copy, use or disclose the contents of this communication to others. Please notify the sender that you have received this email in error by replying to the email or by telephoning +1 617 979 9300. Please then delete the email and any copies of it. Thank you.

Our external privacy policy is available on <https://www.whitecase.com/privacy-policy>.
